



Neumann Capital Management, LLC

Investment Management & Financial Planning

Your Privacy Is Important To Us

May 2018

At Neumann Capital Management, LLC (“NCM”) our clients have access to a broad range of products and services. To deliver these products and services as effectively and conveniently as possible, it is essential that we manage and maintain certain client information.

Like most industries today, the financial services industry continues to be shaped by technology, which is literally changing the way we do business. To be successful in this environment, we must continue to ensure that our clients are confident that we will manage their financial affairs expertly and confidentially.

To affirm our continued commitment to the proper use of client information and protecting your privacy, we have set forth the following privacy policies.

Categories of Personal Information We Collect

The types of Personal Information we collect and share depend on the product or service you have with us. We collect personal information that may directly or indirectly identify you, including non-public personal information (“Personal Information”), from the following sources:

- information we receive from you on applications, client questionnaires and other forms;
- information about your investment transactions from financial service institutions, accountants, lawyers, mortgage brokers and others.

Personal Information about you will be maintained during the time you are a client and for the required time thereafter that such records are required to be maintained by federal and state laws.

How Your Personal Information is Used

We will only use your Personal Information for the purpose of providing you with our investment services. In providing services to you, we will use your Personal Information to:

- assess your application and provide our products and services to you;
- monitor, audit, evaluate and otherwise administer our products and services;
- provide continuous service to you and to conduct business processing functions including by providing Personal Information to our related bodies corporate, contractors, service providers or other third parties;
- assist with the administrative, marketing (including direct marketing), planning, product or service development, quality control or research purposes of NCM and its contractors and service providers;
- communicate with you and respond to your inquiries;
- conduct investigations and comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our policies and terms;
- for other purposes required or authorized by law, including other purposes for which you have provided your consent.

In addition to the above, we use Personal Information to comply with applicable legal requirements, carry out our contractual obligations and pursue our legitimate interests (such as managing our client relationships). Where required by applicable law, we obtain consent to process Personal Information.

In the event that we use Personal Information for other purposes not identified above where direct client consent is required under applicable rules, laws and/or regulations we will provide specific notice at the time we collect such Personal Information.

Disclosure of Personal Information to Third Parties

We do not disclose nonpublic personal information to nonaffiliated third parties (such as brokerage firms or insurance companies) except as permitted by law or in carrying out the duties for which you retained us. It is our policy to contact you prior to the release of any nonpublic private information to nonaffiliated third parties and to provide you with the option to opt out.

If we provide Personal Information to a third party with which we have a business relationship, we will have the third party execute a signed non-disclosure agreement and/or otherwise ensure that they will keep such information confidential, consistent with the conduct of our business relationship.

We do not provide your Personal Information to mailing list vendors or solicitors for any purpose.

Disclosure of any nonpublic Personal Information about our former clients is handled in the same manner as for our current clients.

USE OF THIRD PARTY TRADE DATA MANAGEMENT SERVICES: We are aided in our ongoing portfolio management and client account monitoring services by the use of third-party portfolio and trade data management software and services provided by Charles Schwab & Co., Inc. and Envestnet-Tamarac. Such third-party services provide linked access to client custodial accounts and trade activity and provide “cloud” storage of such data on their secure, internal computer servers on our behalf. We only share nonpublic client information with nonaffiliated third parties when we believe it necessary for our provision of services to you or to maintain your account

IMPORTANT: We use the services of Chicago Clearing Corporation (CCC) to process class action securities litigation claims on behalf of our clients. We provide CCC with some account-holder information and details of securities holdings and transaction history so that they can perform this service, which relieves clients of the need to sign and submit paperwork to participate in class action suits. For providing these services, CCC charges a fee of 20% of the funds that they recover. *If you would prefer NOT to participate in this service, please contact us to opt out.*

Accuracy of Personal Information

We will endeavor to ensure your Personal Information is kept accurate, complete, up to date and relevant. Please let us know if any of your details change. If you feel your Personal Information is not accurate, complete or up to date, please notify us and we will take reasonable steps to ensure it is corrected. You can contact us using the details listed below.

Security of Personal Information

We limit access to nonpublic personal information to only those employees who have a business or professional reason for knowing it and only to nonaffiliated third parties as permitted by law. For example, federal regulations permit us to share a limited amount of information with brokerage firms in order to transact business on your behalf and federal and state regulators, in the course of inspecting us, may also have access to your data. We maintain physical, electronic and procedural safeguards to guard your nonpublic personal information.

Retention of Personal Information

To the extent permitted by applicable law, we retain your Personal Information for the duration of the client relationship. Your Personal Information may also be retained in accordance with another lawful basis as necessary for us to comply with our contractual obligations, legal obligations, regulatory obligations, or for the protection of legal claims.

Individual Rights

To the extent provided under the law of your jurisdiction, in relation to your Personal Information you may request:

- to have your Personal Information corrected, for example, if it is incomplete or incorrect;
- to opt out of receiving marketing communications at any time;
- the right to file a complaint with an applicable government regulator such as a Data Protection Authority.

In addition to the foregoing, if you are located in the European Economic Area ("EEA") or Switzerland, to the extent permitted by applicable law, you may request:

- to access the Personal Information held by us about you;
- the right to restrict or object to the processing of your Personal Information, or request that your Personal Information is erased;
- the right to receive a copy of the Personal Information which you have provided to the firm, in a structured, commonly used and machine-readable format (known as "data portability");
- where you have provided Personal Information voluntarily, or otherwise consented to its use, the right to withdraw your consent.

To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to your information.

To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your Personal Information that we maintain.

Data Transfers

We may transfer the Personal Information we obtain about you to recipients in countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. To the extent required by law, when we transfer your information to recipients in other countries (such as the United States, United Kingdom, Ireland or Cayman Islands), we will protect that information as described in this *Notice*.

If you are located in the European Economic Area ("EEA") or Switzerland, we will comply with applicable legal requirements regarding the provision of appropriate safeguards for the transfer of Personal Information to recipients in countries for which the European Commission has not issued an adequacy decision.

Our Commitment

We want to assure you that we are committed to maintaining the confidentiality, integrity and security of your personal information. The safeguarding of client information is an issue we take seriously; whenever information is used, it is done with discretion.

We have developed these privacy policies to protect our clients. These policies are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreement we have with our clients.

We want our clients to understand our commitment to their privacy and our use of client information. If you have any further questions regarding this privacy policy or would like to exercise your rights, you may contact our Chief Compliance Officer using the information below.

Data Controller

As identified under applicable law, NCM is a Data Controller located at the address below.

Contact at NCM

Attention: Daniel J. Neumann, CFA
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Foster City, CA 94404
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